

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, et al.,

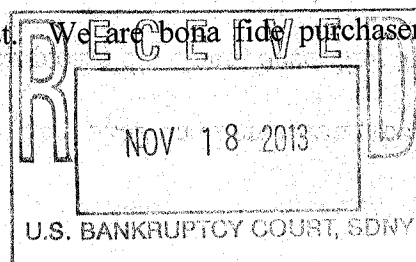
Debtors.

Case No. 12-12020 (MG)

Chapter 11

**CREDITOR'S REPLY IN SUPPORT OF CREDITOR'S OBJECTION TO OMNIBUS
CLAIMS (MISCLASSIFIED AND WRONG DEBTOR BORROWER CLAIMS)**

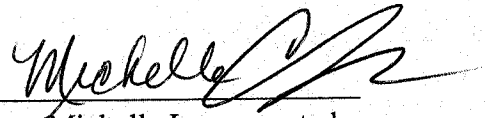
1. Good afternoon your Honor. Thank you for hearing me. I am Michelle Lawson representing Michelle Lawson, et al., claim number 5282 and I am asking the Court to let our status as secured creditors stand. If it may please the Court, according to Section 15 of the Debtor's Omnibus reply, the Debtors have reviewed their books and records; however, they make no mention of the fraudulent *and* defective mortgage application. Although it was not attached to the proof of claim, by their own admission, they are aware of its presence.
2. Not all parties signed the mortgage application. In fact, it was signed by one party alone whose: (1) assets were insufficient to support such a loan and (2) liabilities were in excess of \$30,000.
3. Secured creditor status is imputed to us because of the fraudulent and defective mortgage application and the egregious nature of the transaction. A fraudulent transfer creates an interest and by extension a security interest. We are bona fide purchasers for value



because we have dutifully and in good faith paid the mortgage on the collateral since February 2005.

4. The Debtors state in Section 15 of the Omnibus reply "no other Debtor entity had any involvement with the loan as an originator, investor or servicer." That is untrue because MLNUSA and Sovereign Bank were investors and servicers on the loan prior to 2007.
5. Because the Debtors' books and records have been examined numerous times and recently in conjunction with these proceedings, it is most probable that the Debtors are aware of the fraudulent and defective mortgage application. Furthermore, in a fraudulent transfer, there is an assumption that there is a transfer of some property or interest. In this case, I believe it is secured creditor status and this status is imputed to us through the collateral located in Philadelphia, Pennsylvania. Moreover, we have dutifully and in good faith paid a wrongfully acquired debt and honored a Mortgage and Note for which we were fraudulently induced to contract.
6. Your Honor, I believe this Court has jurisdiction over this matter as it relates to secured creditor status for the claimant, Michelle Lawson et al., claim number 5282. The claim should not be redesignated and reclassified as unsecured. Thank you, your Honor.

Date: 11/15/2013

Signature: 
Name: Michelle Lawson, et al.
Address: 226 East Gorgas Lane
Philadelphia, PA 19119
Claim: Claim Number 5282

Re: Nov. 15, 2013
Omnibus Hearing at 10:00 AM.